LEWIS BRISBOIS BISGAARD & SMITH LLP

110 S.E. 6<sup>th</sup> Street, Suite 2600

Fort Lauderdale, Florida 33301

Tel.: 954-828-0357 Fax: 954-678-4090 David H. Haft, Esq.

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

 X	

: Chapter 11 In re: :

: Case No. 24-10669

ERICA ITZHAK, :

Debtor. :

UNOPPOSED MOTION PURSUANT TO BANKRUPTCY RULE 4007(c) TO FURTHER EXTEND THE DEADLINE TO OBJECT TO DEBTOR'S DISCHARGE

On October 15, 2024, this Court signed an order to extend the deadline of Creditor and Interested Party, Jossef Kahlon ("Mr. Kahlon") by which Mr. Kahlon is required to file a complaint under Section 523(c) of Title 11 of the United States Code (the "Bankruptcy Code") to determine the dischargeability of a debt owed to Mr. Kahlon by the chapter 11 Debtor in the above-entitled action, Erica Yitzhak. ("Debtor" or "Ms. Yitzhak") to January 6, 2025. *See* ECF No. 66. As set forth in the related motion, the extension was necessary to facilitate settlement discussions between the parties. *See* ECF No. 66.

The parties are still engaged in settlement discussions. Accordingly, the Debtor's counsel, Mr. Scott S. Markowitz, has consented in writing to a further extension to January 20, 2025. The request is being styled as a motion as opposed to a stipulation to comply with the literal language of Bankruptcy Rule 40007(c). Mr. Kahlon respectfully submits that request should be granted

because settlement discussions are ongoing and the Debtor has consented to the relief sought herein.

Dated: January 6, 2025

## LEWIS BRISBOIS BISGAARD & SMITH LLP

110 Southeast Sixth Street, Suite 2600 Fort Lauderdale, Florida 33301 Telephone: (954) 728-1280

Facsimile: (954) 678-4090

E-Service: ftlemaildesig@lewisbrisbois.com

77 Water Street, Suite 2100 New York, New York, 10005 Telephone: (212) 232-1300 Facsimile: (212) 232-1399

By:/s/ Minyao Wang
Minyao Wang, Esq.
minyao.wang@lewisbrisbois.com

## **CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).